

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CIBA SPECIALTY CHEMICALS)	
CORPORATION, a Delaware Corporation,)	
)	C.A. No.: 06-672-JJF
Plaintiff)	
)	
)	
v.)	
)	
)	
3 V, INC., a Delaware Corporation,)	
)	
Defendant)	
)	

REPLY TO COUNTERCLAIM

Comes now the plaintiff CIBA Specialty Chemicals Corporation ("CIBA") by counsel, and answers each numbered paragraph of 3V, Inc.'s counterclaim with respectively numbered paragraphs as follows:

Jurisdiction and Venue

1. Ciba admits that this Court has jurisdiction under 28 U.S.C. §1331 and 28 U.S.C. §1338(a). The remaining allegations in this paragraph of the Counterclaim require no reply.
2. Admitted.

The Parties

3. CIBA admits that the '973 patent names Giuseppe Raspanti of Bergamo, Italy as inventor but has only counterclaimant's representations as to the remaining allegations of this paragraph of the counterclaim and, to that extent, denies the remaining allegations and leaves counterclaimant to its proofs.

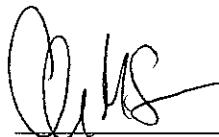
4. Admitted.
5. Admitted except that Ciba is properly entitled to the benefit of the January 23, 1995 filing date of European Application No. EP 95810042.
6. Denied.

Count I

7. Ciba repeats its replies to paragraphs 1 - 6 of the Counterclaim as if fully set forth herein.
8. Denied.

General Denial:

Ciba denies that Counterclaimant is entitled to judgment requested in the counterclaim.



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Dated: December 11, 2006

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2006, I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

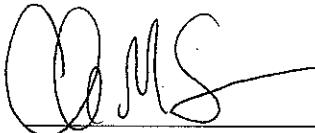
BY HAND

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I hereby certify that on December 11, 2006, I sent the foregoing document by electronic mail, to the following non-registered participants:

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